

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF PENNSYLVANIA

VALERIE RICKETTS

JURY TRIAL DEMANDED

v.

CASE NO.

LEGAL MEDIATION PRACTICE, INC.

COMPLAINT

1. Plaintiff seeks relief pursuant to the Fair Debt Collection Practices Act (“FDCPA”), 15 U.S.C. §1692.
2. This Court has jurisdiction. 15 U.S.C. § 1692k, 28 U.S.C. § 1331.
3. Plaintiff is a natural person who resides in Clearfield County, Western District of Pennsylvania.
4. Plaintiff is a consumer within the FDCPA.
5. Plaintiff allegedly incurred a debt within the FDCPA.
6. Defendant holds itself out to the public as a collection agency.
7. Defendant is a debt collector within the FDCPA.
8. Defendant’s collection efforts took place within the past year.
9. Defendant falsely threatened arrest if plaintiff didn’t pay.
10. Defendant falsely threatened to charge plaintiff with failure to pay, fraud and passing bad checks if payment wasn’t made.
11. Defendant’s collector, “Michael Davis”, created the false impression that he was an attorney.
12. Defendant created a false sense of urgency.

13. Defendant's collector, "Michael Davis", disclosed to un-authorized third parties that he was trying to reach plaintiff in regards to a "legal matter."

14. Defendant falsely threatened suit.

FIRST COUNT

15. In the collection efforts, defendant violated the FDCPA, *inter alia*, §1692c(b), 1692d, 1692e, 1692e(3), 1692e(4), 1692e(5), 1692e(7), 1692c(10) and 1692f.

16. As a result of defendant's illegal collection activities, plaintiff suffered actual damages in the form of anger, anxiety, emotional distress, fear, frustration, upset, humiliation, embarrassment, as well as unjustified and abusive invasions of personal privacy.

WHEREFORE, plaintiff respectfully requests this Court to:

- A. Award plaintiff such damages as are permitted by law, including actual damages and \$1,000 statutory damages; and
- B. Award the plaintiff costs of suit and a reasonable attorney's fee.

JEFFREY L. SUHER, P.C.

By: /s/ Jeffrey L. Suher  
Jeffrey L. Suher, Esquire  
Pa. I.D. # 74924  
4328 Old Wm. Penn Hwy., Ste. 2J  
Monroeville, PA 15146  
(412) 374-9005  
lawfirm@jeffcanhelp

Attorney for Plaintiff